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February 17, 2023

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**VIA ECF FILING**

Magistrate Judge Sallie Kim  
San Francisco Courthouse  
Courtroom C—15th Floor  
450 Golden Gate Ave.  
San Francisco, CA 94102

RE: *In re: McKinsey & Co., Inc. National Prescription Opiate Consultant  
Litigation*, Case No. 21-md-02996-CRB (SK)

Dear Magistrate Judge Kim:

The Parties respectfully request a telephonic conference to discuss the procedure to raise disputes about (1) appropriate limits on interrogatories, and (2) a proposed Tribal Plaintiff Fact Sheet and Plaintiff Fact Sheet Implementation Order. *See* Joint Case Management Statement and Discovery Schedule (“Discovery Schedule”) (Dkt. 440). Plaintiffs do not believe the disputes are ripe and suggest that further guidance from Judge Breyer on a supplemental schedule would narrow or entirely resolve the disputes. McKinsey does not agree that addressing a supplemental schedule is necessary at this time or that it would obviate the Parties’ discovery disputes. The Parties are available for a telephone conference on February 21, 22, or 24, 2023 at the Court’s convenience. The Parties agree that, by requesting a telephone conference in lieu of filing a statement of dispute at this time, no Party waives its right to file a statement of dispute at a later date.

Respectfully submitted,



Elizabeth J. Cabraser  
*Plaintiffs’ Lead Counsel*

cc: All counsel via ECF

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